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December 17, 2005

Scott A. Lathrop, Esq.
SCOTT A. LATHROP & ASSOCIATES
122 Old Ayer Road
Groton, MA 01450

***Re: Stephen Keefe v. Local 805, Internat'l Longshoremen's Assoc., et al.
United States District Court, District of Massachusetts
Civil Action No. 04-CV-11340-DPW***

Dear Mr. Lathrop:

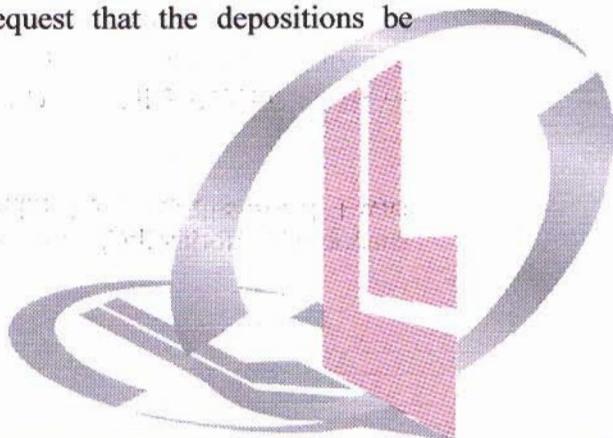
This will acknowledge receipt of service of the Deposition Subpoenas Duces Tecum issued to Messrs. William Sullivan and Brendan Lee. As discussed, I was glad to accept service on their behalf.

Pursuant to, and in accordance with, Rule 45(c)(2)(B) of the Federal Rules of Civil Procedure, this letter will serve as my written objection to the inspection, copying, and/or production of the designated documents as set out in the corresponding Notices of Taking Deposition. In this regard, I am presuming that those Notices are *de facto* Schedules of documents requested, as contemplated by 45(a)(2).

Specifically, but without limitation, the Deponents object to the inspection, copying, and/or production of the requested documents on the grounds that the requests as drafted are overly broad and impermissibly vague, and thus not reasonably calculated to lead to the discovery of admissible evidence. Moreover, several of the requested documents are beyond the scope of permissible discovery under statutory privileges.

Accordingly, while the Deponents are amenable to appearing and testifying on the noticed date, they will not be voluntarily producing any of the requested documents. If you choose to bring a motion to compel the production of these documents, as contemplated by Rule 45(c)(2)(B), I respectfully request that the depositions be put over indefinitely until the resolution of the motion.

Very truly yours,
John P. Lennon
John P. Lennon, Attorney at Law
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Scott A. Lathrop, Esq.

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Thank you for your anticipated cooperation. Please do not hesitate to contact me with any questions you might have.

Very truly yours,

LENNON LAW OFFICES

Michael T. Lennon

MTL: bms

cc: Michael L. Mahoney, Esq.
Edward J. McNelley, Esq.
John M. McAuliffe, Esq.
Mr. William Sullivan
Mr. Brendan Lee

